



United States  
Department of  
Agriculture

Forest  
Service

Alaska Region  
Tongass National Forest

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File Code: 1570

Date: November 6, 2014

David Beebee  
Councilman and Environmental Representative  
City of Kupreanof  
P.O. Box 50  
Petersburg, AK 99835

**Certified Mail – Return Receipt  
Requested:**  
(place CRR no. here)

Dear Mr. Beebee:

This letter is my response to your objection to the draft Decision Notice of the Mitkof Environmental Assessment project you filed on behalf of the City of Kupreanof. The legal notice of the objection period for the Mitkof Project was published on August 7, 2014. On September 22, I received your objection for the Mitkof Island Project. I have read your objection and reviewed the project record, the draft DN/FONSI, and the final Environmental Assessment (EA). My review of your objection was conducted in accordance with the regulation at 36 CFR 218.

### **Project Overview**

The Mitkof Island Environmental Assessment (EA) was prepared in response to goals and objectives in the 2008 Tongass Land and Resource Management Plan (Forest Plan) for Timber (p. 2-7) and Local and Regional Economies (p. 2-5) and reflects the need to provide a sustained yield of timber volume responsive to local and regional needs. The project also seeks to provide some young-growth timber to help facilitate transition to a young-growth based wood products industry. The project is designed to help provide a dependable and timely supply of timber in support of small operators while also having the ability to provide a larger offering of volume across fluctuating market conditions, in support of local employment and the local and regional wood products industry.

The draft Decision Notice (DN) would authorize Alternative 2, which would allow for the harvest of approximately 28.5 million board feet (MMBF) of timber on about 4,117 acres of National Forest System (NFS) land delineated into individual units utilizing a variety of silvicultural prescriptions and logging systems. Full implementation includes an estimated 1.3 miles of new NFS road construction, 4.7 miles of temporary road construction and approximately 4.5 miles of road reconditioning. The decision would provide for small timber sales (green saw timber, fuelwood offerings and young-growth commercial thinning), provide a one-time predominantly helicopter-based offering with a limited number of ground-based (cable) harvest units requiring road construction, and support a programmatic microsale program on Mitkof Island.

### **Resolution Meeting**



On September 29, 2014 my staff contacted you, in an effort to convene a meeting to discuss your concerns about the Mitkof Project. However, following an email exchange and further consideration it was decided a meeting would likely not resolve your request to either select the No Action alternative or prepare an EIS, and therefore a meeting was not scheduled.

### **Response to Issues**

I have read your objection and suggested remedies, and reviewed the EA, draft DN and Finding of No Significant Impact (FONSI), content in the project file as well as considered the comments submitted during the opportunities for public comment for this project. Based on my review, I am providing responses to your objection issues, which include instructions to the District Ranger under ISSUE A.

As specified at 36 CFR 218. 11(b), I must provide a written response that sets forth reasons for the response; however, this written response need not be point-by-point. My responses are as follows:

- *ISSUE A – Subsistence and Deer Hunting – the objector alleges*
  - The Forest Service uses arbitrary subsistence rationale in the DN/FONSI.
  - the EA violates NEPA and NFMA by failing to evaluate the cumulative effects of the project on deer and wolf populations and subsistence hunting in a WAA already below the S&G

***Objection Response** - A subsistence evaluation was conducted in accordance with ANILCA Section 810 (see Mitkof Island EA Subsistence report). The methods developed in cooperation with our interagency partners were used as reflected in the 2011 Tongass Direction for Project-level Deer, Wolf, and Subsistence Analysis. Modeled deer habitat capability along with other indicators were appropriately used to analyze the effects on subsistence with regard to changes in deer abundance and hunter competition and access. This issue was also already addressed in response to comments #s 4, 5, 6, 7, 10, 42, 53, 54, and 56.*

*I support District Ranger Anderson's decision and find that the effects analysis for deer, wolves and subsistence hunting is adequate; however, I find that the conclusions drawn from the direct, indirect and cumulative effects to deer, wolves and subsistence deer hunting are not clearly distinguished in relation to the FONSI. Therefore, I am instructing the District Ranger to clarify and further explain his conclusions and rationale to provide a clear connection from the analysis to the finding in the FONSI before signing the final decision.*

- *ISSUE B – Deer Winter Range – the objector alleges*
  - The EA/FONSI falsely claims that further loss of deer winter range is mitigated through the use of partial retention prescriptions.

**Objection Response** - Regarding your concerns about relying on partial harvest to mitigate impacts to deer wolves and deer hunting, the IDT developed these prescriptions as you point out, in direct response concerns about the further loss of winter deer habitat. This was specifically done by dropping the vast majority of units considered important deer winter habitat and using partial harvest with retention rates of 66 to 98 percent of the pre-harvest basal area in 63 additional units. As a result of this, the reduction of important deep snow winter habitat is limited to 26 acres as a portion 10 clearcut units distributed across the project area and 44 acres within 95 and 98 percent basal area retention units (EA, p. 39, Table 5). The Forest has experience with implementing these types of prescriptions. The resulting openings from implementation of 66% retention partial harvest prescriptions is predominantly from the removal of individual and/or small groups of trees with the majority of openings being less than 1/4 of an acre in size. Larger openings up to the maximum size of 2 acres are the exception rather than the rule and are generally widely scattered. Experience with implementing these types of prescriptions has also shown that the larger openings also tend be long, narrow “snake-like” openings rather than circular. The deer model was appropriately used to analyze effects to deer habitat from partial harvest and considered the relevant factors.

- **ISSUE C – Timber Economics and Local Economy – the objector alleges**
  - The EA/FONSI is based on false and incomplete economic rationale and that nearly half of the sale volume cannot be regarded as a meaningful contribution to supporting the local economy.
  - **Objection Response** - Response to Comments #37, #43, #86, and #30 provide an adequate response to this objection point. The EA also describes how the project will contribute a reliable supply of economically viable timber both regionally and locally in the Petersburg vicinity (p. 4) and describes the direct and indirect benefits of the implementing the project on the Forest Products industry and that the indicated advertised rates are currently positive (p. 29-30).

An explanation of why the project was scheduled on Mitkof Island is explained in the document titled Reasons for Scheduling the Environmental Analysis of the Mitkof Island EA - FY 2014 (PR # 0248) and the Timber Resource Report (PR# 0547) explains what the local operators want, as well as, the interest from a local operator to develop a larger mill in the area (PR #s 0124 and 0155). Larger volume contracts provide and maintain the infrastructure and skills that benefit smaller operators. Under the Mitkof project, there are an adequate number of units designed for small sales in addition to the units with 95% and 98% retention that are specifically designed for microsales.

## **Conclusion**

I commend the Petersburg District Ranger and his interdisciplinary team for the extra effort they put into the Mitkof Island EA and Draft Decision Notice and FONSI. Their effort to involve the public and other agencies early in the planning for this project is evident in the design of the alternatives and responsiveness to issues related to deer habitat, subsistence use, and timber economics.

I have reviewed your assertions that the project violates various environmental laws, regulations, policies, and the Forest Plan. My review finds the project is in compliance with these laws, regulations, policies and the Forest Plan; however, the distinction between the direct, indirect and cumulative effects to deer, wolves, subsistence deer hunting and marten relative to the FONSI are not clear to me. Therefore I will provide instructions via a separate letter to the District Ranger that he may not sign final Decision Notice until all my concerns and instructions as described under my responses to objections issue A of this letter are sufficiently addressed (36 CFR 218.12(b)). Once the Decision is signed, the project may be implemented.

My review constitutes the final administrative determination of the Department of Agriculture; no further review from any other Forest Service or USDA official of my written response to your objection is available (36 CFR 218.11(b)(2)).

Sincerely,

Sincerely,

/s/ Forrest Cole  
FORREST COLE  
Forest Supervisor

cc: Jason C Anderson